

# EXHIBIT 1

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

BARBARA JUN, an individual,

Plaintiff,

vs.

REDDIT, INC., a Delaware corporation,

Defendant.

No.

COMPLAINT FOR DAMAGES

**I. NATURE OF THE CASE**

1. This action arises from an employment relationship between Plaintiff Barbara Jun (“Plaintiff” or “Ms. Jun”) and Defendant Reddit, Inc. (“Defendant” or “Reddit”). Plaintiff alleges that Defendant engaged in disability discrimination and retaliation in violation of the Washington Law Against Discrimination (“WLAD”) and the Americans with Disabilities Act (“ADA”). Plaintiff also alleges that Defendant violated the Washington Paid Family and Medical Leave Act (“WPFMLA”) and the federal Family and Medical Leave Act (“FMLA”).

**II. PARTIES**

2. Plaintiff is an individual residing in King County, Washington.

3. Defendant Reddit, Inc. is a Delaware corporation with its principal place of business in San Francisco, California.

4. Defendant transacts business in King County, Washington.

5. Defendant employed Plaintiff in King County at all relevant times.

6. Defendant is an employer subject to the Washington Law Against Discrimination, RCW 49.60 *et seq.* (“WLAD”).

7. Defendant is an employer subject to the Washington Paid Family and Medical Leave Act, RCW Title 50A (“WPFMLA”).

8. Defendant is an employer subject to the Family and Medical Leave Act, 29 U.S.C. § 2601 *et seq.*, as amended (“FMLA”).

9. Defendant is an employer subject to the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.*, as amended (“ADA”).

### III. JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction pursuant to RCW 2.08.010.

11. Venue is proper in King County pursuant to RCW 4.12.020 and RCW 4.12.025. The events giving rise to Plaintiff’s claims took place in King County, and Defendant transacts business in King County.

12. Plaintiff filed a charge of discrimination with the Washington State Human Rights Commission and the U.S. Equal Employment Opportunity Commission (“EEOC”). The EEOC issued Plaintiff a right to sue letter dated February 6, 2024.

### IV. FACTUAL BACKGROUND

13. Plaintiff began working for Reddit in May 2021 as a product manager. She reported to Jason Lee, who managed a small team of employees. Ms. Jun performed well in the position. This is reflected in her performance reviews and in positive feedback from stakeholders. In June 2022, Ms. Jun was given the highest performance raise on her team.

14. Despite her outstanding performance, Ms. Jun experienced hostile treatment from Mr. Lee. He repeatedly used gender-coded language – calling her too sensitive and emotional. He aggressively berated her in one-on-one meetings. However, he still gave her

1 positive reviews, indicating that his hostile treatment of her was not because of any genuine  
2 performance deficiencies.

3 15. It appeared to Ms. Jun that part of the reason Mr. Lee treated her negatively  
4 was because of her ADHD, which constitutes a disability under the WLAD and the ADA.  
5 Ms. Jun disclosed to Mr. Lee that she has ADHD and that her ADHD causes her to be a literal  
6 thinker who asks direct questions to ensure that she understands what is being communicated.  
7 Mr. Lee disregarded this and became annoyed whenever Ms. Jun asked questions. Instead of  
8 treating Ms. Jun's ADHD like a genuine medical diagnosis that might require reasonable  
9 accommodations, Mr. Lee responded in a dismissive tone that a good PM wouldn't let it  
10 impact their job.

11 16. Ms. Jun complained to HR about Mr. Lee in October 2022. Ms. Jun expressly  
12 raised her ADHD when complaining about Mr. Lee, and she mentioned reasonable  
13 accommodations that she believed would be helpful. HR never followed up with Ms. Jun.

14 17. Ms. Jun went on leave in December 2022 for medical reasons. HR told Ms.  
15 Jun that she did not need to take WPFMLA or FMLA if the leave is for less than 4 weeks, so  
16 Ms. Jun used PTO instead. Ms. Jun and Mr. Lee discussed her leave on November 28, 2022,  
17 but this was not their first discussion regarding the leave. During the November 28th  
18 discussion, Mr. Lee was upset and said that their new director, Spiros Christakopoulos, was  
19 caught off guard by Ms. Jun's leave.

20 18. On December 1, 2022, Ms. Jun had a meeting with Mr. Christakopoulos. Ms.  
21 Jun told Mr. Christakopoulos that she was going on leave for a mental health condition.  
22 Similar to Mr. Lee, Mr. Christakopoulos was irritated by the leave. He told Ms. Jun that this  
23 was going to be a busy year and that everyone needed to be as productive as possible. Ms.  
24 Jun also told Mr. Christakopoulos about some of her issues with Mr. Lee's hostility. Mr.  
25 Christakopoulos responded that Ms. Jun needed a thicker skin and was being overly sensitive.  
26 Mr. Christakopoulos stated that Mr. Lee is a man who knows how to control his emotions and

1 that Mr. Lee had never been aggressive to him. Ms. Jun's voice momentarily cracked while  
 2 having this difficult conversation, and Mr. Christakopoulos responded with irritation by  
 3 asking if she was going to get emotional because he was not prepared to handle that. He also  
 4 informed Ms. Jun that he would pick Mr. Lee over her if they had a conflict.

5 19. Ms. Jun returned from her PTO leave in early January 2023. She informed Mr.  
 6 Lee that she anticipated taking additional medical leave in 2023. On December 30, 2022, Ms.  
 7 Jun contacted Reddit's leave administrator about taking WPFMLA/FMLA leave. On or about  
 8 January 16, 2023, the leave administrator gave Ms. Jun the leave paperwork to complete.

9 20. Ms. Jun was terminated on January 26, 2023. Reddit's CEO told employees  
 10 that the terminations were based on performance assessments, and Mr. Christakopoulos told  
 11 Ms. Jun the same thing during her termination meeting. Based on Ms. Jun's strong  
 12 performance history, this explanation is a pretext.

13 21. Reddit retained a similarly situated co-worker to Ms. Jun. The similarly  
 14 situated co-worker had the exact same title as Ms. Jun and reported to Mr. Lee, who  
 15 conducted the similarly situated co-worker's performance reviews. Ms. Jun and this similarly  
 16 situated co-worker shared their performance reviews with each other, and Ms. Jun's reviews  
 17 were more positive. Ms. Jun was also given a larger performance raise than this similarly  
 18 situated co-worker in the summer of 2022.

19 22. Reddit retained this co-worker while terminating Plaintiff because Reddit was  
 20 treating Ms. Jun's protected complaints about Mr. Lee as a negative factor and/or treating Ms.  
 21 Jun's leave and her disclosure that she intended to take additional medical leave in 2023 as a  
 22 negative factor. Ms. Jun's disabilities were also a substantial factor in the termination  
 23 decision.

## 24 **V. FIRST CAUSE OF ACTION**

### 25 **RETALIATION IN VIOLATION OF THE WLAD**

26 23. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 22.

1           24. Plaintiff's complaints about the way that Mr. Lee was treating her because of  
2 her disability were a substantial factor in Defendant's decision to select Plaintiff for  
3 termination.

4           25. Plaintiff's decision to take leave for a disability and her disclosure that she  
5 intended to take additional leave for a disability were also substantial factors in Defendant's  
6 decision to select Plaintiff for termination.

7           26. Defendant's termination of Plaintiff constitutes retaliation in violation of the  
8 WLAD.

9           27. As a result, Plaintiff has suffered damages, including mental and emotional  
10 distress and lost wages and benefits, in amounts to be determined at trial.

11                           **VI. SECOND CAUSE OF ACTION**

12                           **DISPARATE TREATMENT BECAUSE OF DISABILITY**

13                           **IN VIOLATION OF THE WLAD**

14           28. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 27.

15           29. Defendant treated Plaintiff's actual and/or perceived disabilities as a  
16 substantial negative factor when selecting Plaintiff for termination. In doing so, Defendant  
17 engaged in disability discrimination in violation of the WLAD.

18           30. As a result, Plaintiff has suffered damages, including mental and emotional  
19 distress and lost wages and benefits, in amounts to be determined at trial.

20                           **VII. THIRD CAUSE OF ACTION**

21                           **FAILURE TO ACCOMMODATE IN VIOLATION OF THE WLAD**

22           31. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 30.

23           32. Defendant failed to provide reasonable accommodations for Plaintiff as  
24 required by the WLAD. Defendant also failed to engage in the interactive process of  
25 exploring possible accommodations for Plaintiff as required by the WLAD.  
26

1           33. As a result, Plaintiff has suffered damages, including mental and emotional  
2 distress and lost wages and benefits, in amounts to be determined at trial.

3                           **VIII. FOURTH CAUSE OF ACTION**

4           **VIOLATION OF THE WASHINGTON PAID FAMILY AND MEDICAL LEAVE ACT**

5           34. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 33.

6           35. Plaintiff disclosed to Defendant that she intended to take medical leave, which  
7 would have been leave pursuant to the Washington Paid Family and Medical Leave Act,  
8 RCW Title 50A (“WPFMLA”).

9           36. Defendant violated the WPFMLA by treating Plaintiff’s disclosure of her  
10 intent to take medical leave as a negative factor when selecting Plaintiff for termination.

11           37. As a result, Plaintiff has suffered damages, including lost wages and benefits,  
12 in amounts to be determined at trial.

13           38. Plaintiff is also entitled to liquidated damages pursuant to RCW  
14 50A.40.030(4).

15                           **IX. FIFTH CAUSE OF ACTION**

16                           **VIOLATION OF THE FMLA**

17           39. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 38.

18           40. Plaintiff disclosed to Defendant that she intended to take medical leave, which  
19 would have run concurrently under the WPFMLA and the Family and Medical Leave Act, 29  
20 U.S.C. § 2601 *et seq.*, as amended (“the FMLA”).

21           41. Defendant violated the FMLA by treating Plaintiff’s disclosure of her intent to  
22 take medical leave as a negative factor when selecting Plaintiff for termination. In doing so,  
23 Defendant engaged in FMLA interference and/or retaliation.

24           42. As a result, Plaintiff has suffered damages, including lost wages and benefits,  
25 in amounts to be determined at trial.

26           43. Plaintiff is also entitled to liquidated damages pursuant to the FMLA.

**X. SIXTH CAUSE OF ACTION**

**DISABILITY DISCRIMINATION IN VIOLATION OF THE ADA**

44. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 43.

45. Plaintiff is a qualified individual with a disability under the Americans with Disabilities Act, 42 U.S.C. § 12101, *et seq.*, as amended.

46. Defendant discriminated against and terminated Plaintiff because of her actual disability and/or because Defendant regarded her as having a disability.

47. Defendant's actions have caused Plaintiff to suffer damages, including mental and emotional distress and lost wages and benefits, in amounts to be determined at trial.

**XI. SEVENTH CAUSE OF ACTION**

**FAILURE TO ACCOMMODATE IN VIOLATION OF THE ADA**

48. Plaintiff re-alleges and hereby incorporates paragraphs 1 through 47.

49. Defendant failed to provide reasonable accommodations for Plaintiff as required by the ADA. Defendant also failed to engage in the interactive process of exploring possible accommodations for Plaintiff as required by the ADA.

50. As a result, Plaintiff has suffered damages, including mental and emotional distress and lost wages and benefits, in amounts to be determined at trial.

**XII. PRAYER FOR RELIEF**

Plaintiff Barbara Jun requests that the Court enter judgment against Defendant Reddit, Inc. for the following:

a. Damages for back pay, front pay, and lost benefits, in amounts to be determined at trial;

b. Damages for emotional harm, including but not limited to emotional distress, loss of enjoyment of life, humiliation, pain and suffering, personal indignity, embarrassment, fear, anxiety, and anguish, in an amount to be determined at trial;

c. Liquidated damages under the WPFMLA and FMLA;



- d. Punitive damages for violations of the ADA;
- e. Costs and reasonable attorney's fees;
- f. Prejudgment and post-judgment interest;
- g. Compensation for the tax consequences associated with a damages award; and
- h. Any further and additional relief that the Court deems just and equitable.

DATED this 8th day of April, 2024.

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